

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PATRICIA CUMMINGS,

Plaintiff,

- against -

THE CITY OF NEW YORK, *et al.*,

Defendants.

Index No.: 19-CV-7723-CM

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed Memorandum of Law dated June 25, 2020, the initial motion to dismiss papers incorporated therein (Doc. Nos. 27, 77), and all prior pleadings and proceedings had herein, Defendants Hechinger Institute on Education and the Media, an institute of Teachers College, Columbia University and Dr. Andre Perry (collectively, the “Hechinger Defendants”) will move this Court before the Honorable Colleen McMahon, United States District Judge, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, to dismiss the Amended Complaint in this action in its entirety with prejudice pursuant to Fed. R. Civ. P. 12(b)(6).

PLEASE TAKE FURTHER NOTICE that pursuant to the Court’s Individual Rules, any opposing affidavits and answering memoranda of law must be served within fourteen (14) days of service of this motion. Reply papers, if any, must be served within five (5) days of service of the opposition papers.

Dated: June 25, 2020
New York, New York

HAYNES AND BOONE, LLP
Attorneys for Hechinger Defendants

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